



The Law Office of Kevin J. Keating, P.C.
666 Old Country Road, Suite 900
Garden City, NY 11530
516-222-1099 • 212-964-2702
kevin@kevinkeatinglaw.com
Garden City • Manhattan

May 23, 2022

Via ECF

Hon. Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: USA v. Gulkarov, et al.
Docket No.: 22-cr-00020-PGG

Dear Judge Gardephe:

As Your Honor is aware, on March 21, 2022, I filed an application to be relieved as counsel for Rolando Chumaceiro in this matter. On May 17, 2022, the parties appeared before the Court to address the fact that, as of that time, Mr. Chumaceiro had yet to retain counsel. During the conference, Mr. Chumaceiro was supplied with a financial affidavit, as it appeared that he qualified for the assignment of counsel under the Criminal Justice Act. The Court scheduled an additional conference to address the status of this issue for May 24, 2022.

Since that time, Your Honor granted Mr. Chumaceiro's request to be assigned counsel under the Criminal Justice Act, and I have recently conferred with assigned counsel Matthew Myers.

With this, I write to respectfully request that the status conference of May 24, 2022, be cancelled.

Thank you for your consideration.

Very truly yours,

Kevin J. Keating

KEVIN J. KEATING

KJK/dg

cc: Rolando Chumaceiro (via email)
Matthew Myers, Esq. (via ECF)
AUSA Mathew Andrews (via ECF)